

From: [Mills, Paige](#)
To: [Sam Miller](#)
Cc: [A. Grace Van Dyke James](#); [McClanahan, Teresa](#)
Subject: RE: GFE ANTHEM Correspondence 1 28 2019
Date: Thursday, January 31, 2019 11:42:53 AM

Sam,

Please consider this email my response to your letter dated January 28, 2019. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

As for the documents responsive to 13-14, those documents require us to keep them confidential, except pursuant to a court order. Unfortunately, because I don't feel like I have any room to negotiate on this point, I don't think a meet and confer would be productive on this issue. [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

Thanks,

Paige

From: Sam Miller [mailto:smiller@millerlegalpartners.com]
Sent: Thursday, January 31, 2019 10:05 AM
To: Mills, Paige
Cc: A. Grace Van Dyke James
Subject: RE: GFE ANTHEM Correspondence 1 28 2019

Paige –

We have not received a response to my letter from Monday. At this point, I must insist that we have a meet and confer and if you are unwilling to do so, we will file a motion so informing the court. I have a meeting from 1 p.m. to 2:30 p.m. downtown today. I can meet you before then or after that meeting. I have another meeting around noon tomorrow downtown and could meet you before or after that as well.

Please advise as to what works for you.

Thank you.

Sam

Samuel F. Miller
Miller Legal Partners PLLC
615.988.9011

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From: Sam Miller
Sent: Monday, January 28, 2019 5:03 PM
To: 'Mills, Paige' <PMills@bassberry.com>
Cc: A. Grace Van Dyke James <gjames@millerlegalpartners.com>
Subject: GFE ANTHEM Correspondence 1 28 2019

Paige:

Please see correspondence attached.

Sam

Samuel F. Miller



Fifth Third Center – Suite 2000
424 Church Street
Nashville, TN 37219

Email: smiller@millerlegalpartners.com
Direct: 615.988.9011
Main: 615.988.9590
<https://www.MillerLegalPartners.com>

Please note our recent name change from Bahou Miller PLLC.

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SAMUEL F. MILLER, MEMBER
Direct Phone/Fax: 615.988.9011
Email: smiller@millerlegalpartners.com

January 28, 2019

Via Email

Paige W. Mills
BASS, BERRY & SIMS, PLC
150 Third Avenue South, Suite 2800
Nashville, TN 37201
Phone: (615) 742-6200
Email: pmills@bassberry.com

Re: *Global Force Entertainment, Inc. et al v. Anthem Sports & Entertainment Corp. (Case No. 3:18-cv-00749)*

Dear Paige:

We received your clients' ("Defendants'") responses to the Second Set of Requests for Production.

[REDACTED]

In your email dated January 17, 2019, you note documents responsive to Requests Nos. 13-14 require a "court order" for production. Please advise as to your availability for tomorrow or Wednesday so we can have the meet-and-confer to file a motion to compel and obtain the order.

[REDACTED]

We understand that you are working to produce the other documents that your clients agreed to produce in response to requests for production. However, we would like to get a data

certain for depositions because I have a trial in June and, therefore, we will need to schedule depositions sufficiently before that time.

We kindly request your responses by as soon as possible. We are available for a meet-and-confer unable to resolve these differences this week.

Nothing herein should be construed as an admission or a waiver of any claim or defense.

Sincerely,



Samuel F. Miller

cc: Global Force Entertainment, Inc.
Jeff Jarrett
A. Grace Van Dyke James

From: [Mills, Paige](#)
To: [Sam Miller](#); [A. Grace Van Dyke James](#)
Cc: [McClanahan, Teresa](#)
Subject: RE: GFE/Anthem: Second Set of Discovery Requests
Date: Thursday, January 17, 2019 7:54:51 PM
Attachments: [Anthem000001 to 000006.pdf](#)
[ANTHEM000007.pdf](#)

Sam and Grace,

[REDACTED]
[REDACTED]
[REDACTED] I have documents that are responsive to Requests 13 – 14 but they are contracts with third parties that contain confidentiality provisions that I cannot share. I can only produce them pursuant to a court order.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Thanks,

Paige



Paige Mills

Member

Bass, Berry & Sims PLC

150 Third Avenue South, Suite 2800 • Nashville, TN 37201

615-742-7770 phone • 615-742-0429 fax

pmills@bassberry.com • www.bassberry.com

From: Sam Miller <smiller@millerlegalpartners.com>
Sent: Tuesday, January 15, 2019 4:43 PM
To: Mills, Paige <PMills@bassberry.com>; A. Grace Van Dyke James <gjames@millerlegalpartners.com>
Cc: McClanahan, Teresa <TMcClanahan@bassberry.com>
Subject: RE: GFE/Anthem: Second Set of Discovery Requests

Hi Paige –

When are we going to get actual documents produced to us? If we cannot get a date certain by tomorrow, I'd like to set up a meet and confer for Friday.